

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**SHAWN ROGERS,**

\*

*Plaintiff,*

\*

**v.**

\*

**Civil Action No.:**

**CARY BEDFORD, et al.,**

\*

*Defendants.*

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\* \* \* \* \*

**NOTICE OF REMOVAL**

Petitioner/Defendant, Tom Hassel Transport, Inc. *d/b/a* Hassel Transport (“Hassel Transport”), files this Notice of Removal of this action from the Circuit Court for Baltimore County, Maryland to the United States District Court for the District of Maryland under 28 U.S.C. §§ 1441 et seq. and states as follows:

1. On March 24, 2022, Plaintiff Shawn Rogers (“Plaintiff”) filed his Original Complaint against Cary Bedford and Paccar Leasing Co. in the Circuit Court for Baltimore County, Maryland. Ex. A, Pl.’s Original Compl. at p. 1.

2. On June 10, 2022, Plaintiff filed his Amended Complaint, removed Paccar Leasing Co. from the case, and substituted Hassel Transport in Paccar Leasing Co.’s place. Ex. B, Pl.’s Am. Compl.

3. On June 17, 2022, Plaintiff served Hassel Transport via certified mail. Ex. C, Pl.’s Proof of Serv. for Hassel Transport at p. 1.

4. On July 15, 2022, Hassel Transport filed its Answer to Plaintiff's Amended Complaint in the Circuit Court for Baltimore County, Maryland. Ex. D, Answer to Pl.'s Am. Compl. at p. 1.

5. This action satisfies the requirements for the Court to exercise diversity jurisdiction under 28 U.S.C. § 1332(a)(1) because there is complete diversity of citizenship among Plaintiff and Defendants and the amount in controversy exceeds \$75,000.00:

a. Plaintiff is a citizen of the State of Maryland and resides at 5 Kerria Lane, Baltimore, Maryland 21220.

b. Mr. Bedford is a citizen of the State of New Jersey and resides at 206 Mattix Run, Galloway, New Jersey 08205.

c. Hassel Transport is incorporated under the laws of the State of New Jersey and its headquarters is located at 300 Hawthorne Avenue, Point Pleasant Beach, New Jersey 08742.

d. Plaintiff's Amended Complaint seeks damages in excess of \$75,000.00.

6. This action satisfies the requirements for removal under 28 U.S.C. § 1446(b)(2)(C) because Hassel Transport is a later-served Defendant. Petitioner/Defendant therefore timely filed this Notice of Removal within thirty days of the date when Plaintiff served Hassel Transport. Mr. Bedford consents to removal.

a. Plaintiff served Hassel Transport on June 17, 2022.

b. The date of this Notice of Removal is July 15, 2022.

7. In support of this Notice of Removal all process, pleadings, documents, and orders served on it are attached hereto as Ex. E, the Writ of Summons issued to Hassel Transport; Ex. F,

Amended Complaint; Ex. G, Certificate of Service regarding Amended Complaint; Ex. H, Civil-Non-Domestic Case Information Report and Ex. I, initial Complaint.

WHEREFORE Petitioner/Defendant respectfully requests removal of Case No. C-03-CV-22-001124 pending before the Circuit Court of Baltimore County, Maryland to this Court.

Respectfully submitted,

/s/ Tamara Goorevitz

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*Attorneys for Petitioner/Defendant*

*Tom Hassel Transport, Inc. d/b/a Hassel Transport*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15th day of July 2022, I served a copy of this Notice of Removal via EM/ECF, email, and/or regular mail, first class, postage prepaid on the following:

Stephen L. Freedman, Esq. (26863)

LAW OFFICES OF MICHAEL A. FREEDMAN, P.A.

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*Attorney for Plaintiff Shawn Rogers*

/s/ Tamara Goorevitz

Tamara B. Goorevitz, Esq. (25700)